

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION	:	21 MC 101 (AKH)
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THIS DOCUMENT APPLIES TO CASE:	:	
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02-CV-7154 (AKH)	:	
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**NOTICE OF MOTION TO ENFORCE LITIGATION AGREEMENT
AND FOR DISMISSAL OF CLAIMS ASSERTED IN
BAVIS ACTION AGAINST GLOBE AVIATION SERVICES CORPORATION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of law and Declaration of Gary W. Westerberg dated November 9, 2010, Defendant Globe Aviation Services Corporation (“Globe”) will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, at a date and time to be set by the Court, at the United States Courthouse, 500 Pearl Street, for an Order (1) enforcing Plaintiff’s litigation agreement to be bound by this Court’s prior decision reported at *In re Sept. 11 Litig.*, 594 F. Supp. 2d 374 (S.D.N.Y. 2009) and dismissing the claims asserted in this action against Globe and (2) granting such other and further relief as may be just and proper inclusive of attorneys fees and costs.

Dated: November 9, 2010

Respectfully submitted,



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